



**Pet Food Rule Change Recommendation Necessary and Sufficient:
Comments of the Organic Trade Association on the
Interim Report of the Pet Food Task Force of the
National Organic Standards Board**

September 1, 2006

The Organic Trade Association (OTA) thanks NOSB's Pet Food Task Force for its thoughtful and comprehensive report and rule change recommendation regarding pet foods. We support the recommendations included in the Interim Report. The proposed recommendation meets all of the criteria included in the NOP notice, "Item for Public Comment: NOSB Pet Food Task Force Interim Report."

We especially appreciate the clear distinction made between pets (and specialty pets) and livestock, as livestock on farms are used for food production, and we do not want any confusion between these standards. Similarly, it should be clear that feeding pets organic pet food does not in itself make them "organic pets."

We would also appreciate consideration for pet food companies already meeting the NOP rule for human food through including an appropriate phase-in period to allow for any organic system plan adjustments necessary for currently certified operations, as well as time to prepare and submit materials petitions.

Thank you very much.

